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AT&T COMMUNICATIONS OF ILLINOIS, INC. RESPONSE TO THE IITA'S FIRST DATA REQUEST IITA-1.1 (ICC DOCKET NOS. 00-0233/0335 (consol.))

Requested of Company Representative:

Richard N. Clarke

Company:

AT&T Communications of Illinois, Inc.

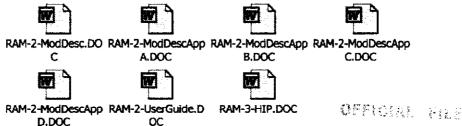
Request IITA-1.1:

Please provide the following regarding HAI versions 5.1 and 5.2 referenced on page 5 of your testimony:

a. Please provide full documentation for these versions of the model including documentation for model inputs.

Response:

A full set of documentation for the HAI 5.2 model is provided in the files that accompany this response. The first file, called "RAM-2", contains the model's Description, User Guide and Appendices. The second file, called "RAM-3-HIP", contains the Inputs Portfolio for the model. Please note that because the HAI 5.2 model has never been prepared for national distribution, the editing of these documents may not be as complete or accurate as the editing of the HAI 5.0a documents. Please contact us if you have any questions about the documentation.



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b. Please provide working versions of versions 5.1 and 5.2 of the HAI model, including data to run those versions of the model for all companies in Illinois.

Response:

One of the major enhancements of the HAI 5.1 and 5.2 models over the 5.0a version is their ability to base their loop plant engineering on calculated "strand" distances between the geocoded and improved surrogate customer locations in the model's dataset. The calculation of these strand distances and improved surrogate locations is a proprietary service performed by TNS Telecoms (formerly PNR and Associates). AT&T has not purchased these data for Illinois from TNS. Thus, AT&T does not have the required data nor a version of either the HAI 5.1 or 5.2 model that is operational for Illinois.